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December 20, 2013

Stephanie Vaughn U.S. Environmental Protection Agency, Region II 290 Broadway New York, New York 10007-1866 Via Electronic Mail

Re: Preliminary Draft Interim Conceptual Site Model Submission – Preliminary Draft - Lower Passaic River Study Area (LPRSA) Administrative Agreement and Order on Consent for Remedial Investigation/Feasibility Study (RI/FS) - CERCLA Docket No. 02-2007-2009

Dear Ms. Vaughn:

The Lower Passaic River Study Area Cooperating Parties Group (CPG) is submitting a preliminary draft of the LPRSA Interim Conceptual Site Model (Interim CSM) for the purposes of discussion and collaboration between USEPA and the CPG on the LPRSA RI/FS. Please note this information is being provided for discussion purposes only between USEPA Region 2 and the CPG.

This submission does not constitute a deliverable as defined by the May 2007 RI/FS Settlement Agreement.

The discussions presented in the Interim CSM do not include a full treatment and the analyses of the following:

- High Volume Chemical Water Column data
- Upper Passaic River Background and Reference data
- SSP 2 Low Resolution Coring data

The CPG is providing this information with the understanding that it will not be distributed outside of the USEPA and its technical contractors prior to discussions between USEPA and the CPG.

The CPG requests the opportunity to meet and discuss with USEPA and its technical contractors the Interim CSM during the week of January 20, 2014.

In addition, the CPG requests the USEPA's most recent LPR CSM document; this would make the meeting would be more productive and collaborative if USEPA Region 2 provided the CPG with the current USEPA LPR CSM for discussion purposes in early January 2014.

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The references listed in Section 7 of the Interim CSM will be forwarded to USEPA under separate cover. The underlying data that supports the Interim CSM has been previously posted to USEPA's LPR SharePoint.

Please contact Bill Potter or me to discuss.

Very truly yours,

de maximis, inc.

Robert Law, Ph.D.

CPG Project Coordinator

cc: Walter Mugden, EPA Region 2

Ray Basso, EPA Region 2 Jim Woolford, EPA HQ

Steve Ells, EPA HQ

Marc Greenberg, EPA HQ

CPG Members

William Hyatt, CPG Coordinating Counsel

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